

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

ADVANCED LITHIUM
ELECTROCHEMISTRY (CAYMAN) Co.
Ltd., and ADVANCED LITHIUM
ELECTROCHEMISTRY CO., LTD.,

*Declaratory Judgment
Plaintiffs,*

v.

HYDRO-QUEBEC; CENTRE NATIONAL
DE LA RECHERCHE SCIENTIFIQUE;
UNIVERSITE DE MONTREAL; and
LIFEPO4+C LICENSING AG,

*Declaratory Judgment
Defendants.*

Case No. 1:24-cv-01421-RDA-WBP

**DEFENDANTS' MOTION TO DISMISS PLAINTIFFS' COMPLAINT WITH
PREJUDICE FOR FAILURE TO STATE A CLAIM**

Defendants Hydro-Quebec, Centre National de la Recherche Scientifique, Universite de Montreal, and LiFePO4+C Licensing AG (collectively, “Defendants”) respectfully file this motion to dismiss with prejudice Plaintiffs’ Complaint (Dkt. No. 1). As set forth in the accompanying memorandum of law in support of this Motion, Plaintiffs’ Complaint fails to meet the pleading standard requirements for the relief requested therein. WHEREFORE, Defendants request that the Court grant Defendants’ Motion and dismiss Plaintiffs’ Complaint with prejudice.

Dated: December 18, 2024

/s/ April E. Weisbruch

April E. Weisbruch (Va. Bar No. 79191)
500 North Capitol Street, NW
Washington, DC 20001-1531
Tele: 202 756 8000

aweisbruch@mwe.com

Kevin Meek (*pro hac vice* pending)
Aashish Kapadia (*pro hac vice* pending)
Christian Tatum (*pro hac vice* pending)
300 Colorado Street, Suite 2200
Austin, TX 78701
Tele: 512 726 2600
kmeek@mwe.com
akapadia@mwe.com
ctatum@mwe.com

Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on this day, December 18, 2024, I served the foregoing document via the Court's CM/ECF system to all attorneys of record in this action.

/s/ April E. Weisbruch
April E. Weisbruch